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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

COMMITTEE ON JOBS CANDIDATE
ADVOCACY FUND and BUILDING
OWNERS AND MANAGERS
ASSOCIATION OF SAN FRANCISCO
INDEPENDENT EXPENDITURE
POLITICAL ACTION COMMITTEE,
political action committees organized
under the laws of California and of the
City and County of San Francisco,

Plaintiffs,

vs.

DENNIS J. HERRERA, in his official
capacity as City Attorney of the City and
County of San Francisco, KAMALA D.
HARRIS, in her official capacity as
District Attorney of the City and County
of San Francisco, the SAN FRANCISCO
ETHICS COMMISSION of the City and
County of San Francisco, and CITY AND
COUNTY OF SAN FRANCISCO,

Defendants.

No. C-07-3199 JSW

**SUPPLEMENTAL DECLARATION
OF NATHAN NAYMAN IN
SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

Date: September 17, 2007

Time: 1:30 p.m.

Judge: Hon. Jeffrey S. White

Courtroom: 2

1 I, NATHAN NAYMAN, declare:

2 1. I submit this Supplemental Declaration in support of Plaintiffs' Motion for
3 Preliminary Injunction and in reply to Defendants' opposition to that motion. I have
4 personal knowledge of the facts stated herein and, if called as a witness, I could and would
5 competently testify thereto.

6 2. As stated in my first declaration (Dkt. 13), I am the Executive Director of
7 Committee on JOBS ("JOBS") and Treasurer of Plaintiff **COMMITTEE ON JOBS**
8 **CANDIDATE ADVOCACY FUND** (the "JOBS Fund").

9 3. Defendants' opposition argues that Plaintiffs, if they "wish to maintain their
10 funding levels," can simply raise funds from a greater number of persons than it does at
11 present. Opposition (Dkt. 19), at 8:26-9:3.

12 4. That is not true of the JOBS Fund. It could not be true unless JOBS were
13 willing to make dramatic changes to its membership, its organizational structure and its
14 mission.

15 5. JOBS is a coalition of San Francisco's largest employers, dedicated to
16 improving the City's economic vitality. JOBS has less than 50 members and has always
17 had 50 or fewer members. JOBS' by-laws limit it to 50 members.

18 6. The JOBS Fund accepts contributions only from JOBS' members.

19 7. JOBS does not wish to change these aspects of its membership, its
20 organizational structure or its mission.

21 I declare under penalty of perjury under the laws of the United States and the State
22 of California that the foregoing is true and correct.

23 Executed on August 31, 2007, at San Francisco, California.

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Nathan Nayman